

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
<b>MATTHEW HANDY</b>	:	<b>VIOLATIONS:</b>
	:	18 U.S.C. § 2261A(2)(B) (cyberstalking –
	:	1 count)
	:	18 U.S.C. § 844(e) (interstate use of
	:	telecommunications device to willfully
	:	convey a threat – 2 counts)
	:	18 U.S.C. § 1001(a) (false statements – 2
		counts)

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Defendant MATTHEW HANDY was a resident of Trainer, Pennsylvania.
2. From at least June 2013 until on or about January 17, 2014, defendant MATTHEW HANDY and Z.H., a person known to the grand jury, were romantically involved in a relationship.
3. On or about January 17, 2014, Z.H. broke off the relationship with defendant MATTHEW HANDY and relocated from Pennsylvania to a residence in New Jersey.
4. Beginning on or about January 17, 2014, through on or about February 24, 2014, defendant MATTHEW HANDY engaged in a campaign of harassment directed at

Z.H., including making anonymous telephone calls and sending anonymous electronic mail messages to law enforcement agencies and other agencies, including the National Center for Missing and Exploited Children, the New Jersey Office of Homeland Security and Preparedness, the United States Department of Homeland Security, and the Atlantic County (NJ) Prosecutor's Office's "Crime Stoppers" website, that falsely alleged that Z.H. was engaging in child exploitation and molestation, using drugs, building pipe bombs, and intended to use guns and explosives as acts of domestic terrorism at a New Jersey middle school where Z.H.'s brother was enrolled and at various other buildings in Pennsylvania and New Jersey.

5. From on or about January 17, 2014 to on or about February 24, 2014, in Trainer, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

**MATTHEW HANDY,**

with the intent to injure, harass, and intimidate another person, that is, Z.H., used facilities of interstate and foreign commerce, including electronic mail and internet websites, to engage in a course of conduct, as set forth above, that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Z.H.

In violation of Title 18, United States Code, Section 2261A(2)(B).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 4 of Count One are realleged and incorporated here.
2. On or about January 27, 2014, in Trainer, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

**MATTHEW HANDY,**

by means and use of an instrument of interstate and foreign commerce, that is, an electronic communication using the internet, maliciously conveyed false information, knowing the same to be false, concerning an alleged attempt and attempt to unlawfully damage and destroy a building by means of an explosive, that is, defendant MATTHEW HANDY forwarded an electronic message to the New Jersey Office of Homeland Security and Preparedness that falsely alleged that Z.H. intended to use explosive devices against the Salvation Army in Chester, Pennsylvania and the Chester (PA) Police Headquarters at 9:00 a.m. on January 27, 2014.

In violation of Title 18, United States Code, Section 844(e).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 4 of Count One are realleged and incorporated here.
2. On or about February 10, 2014, in in Trainer, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, defendant

**MATTHEW HANDY,**

by means and use of an instrument of interstate and foreign commerce, that is, an electronic communication using the internet, maliciously conveyed false information, knowing the same to be false, concerning an attempt and alleged attempt to kill, injure, and intimidate individuals and unlawfully damage and destroy a building by means of an explosive, that is, defendant MATTHEW HANDY forwarded an electronic message to the Atlantic County (NJ) Prosecutor's Office's "Crime Stoppers" website that falsely alleged that Z.H. and another individual, known to the grand jury, intended to attack a middle school in New Jersey with guns and a pipe bomb on the morning of February 10, 2014, which false allegation caused the school (approximately 393 students and 58 faculty members) to have to be evacuated and the school searched by the New Jersey State Police's K-9 Unit and Bomb Squad.

In violation of Title 18, United States Code, Section 844(e).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 4 of Count One are realleged and incorporated here.

2. On or about January 28, 2014, in Trainer, in the Eastern District of

Pennsylvania, and elsewhere, defendant

**MATTHEW HANDY,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the United States Department of Homeland Security ("DHS"), knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, that is, defendant MATTHEW HANDY sent an anonymous electronic mail message to DHS falsely alleging that Z.H. was selling drugs and explosives to others, threatened to use explosives at undisclosed locations, kept explosives somewhere in Atlantic City, New Jersey, and threatened to use explosives at an unidentified mall in New Jersey.

In violation of Title 18, United States Code, Section 1001(a).



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

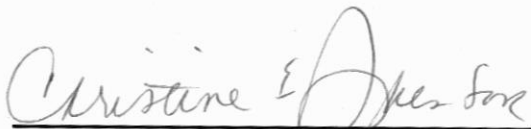
1. Paragraphs 1 through 4 of Count One are realleged and incorporated here.
2. On or about February 9, 2014, in Trainer, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MATTHEW HANDY,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the United States Department of Homeland Security ("DHS"), knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, that is, defendant MATTHEW HANDY sent anonymous electronic mail messages to DHS falsely alleging: Z.H. and Z.H.'s immediate family members were obtaining materials to make explosives; one of Z.H.'s immediate family members was supplying Z.H. and another immediate family member with fertilizer and metal pipes to make the explosives; and, Z.H. and an immediate family member intended to use the explosives against other family members.

In violation of Title 18, United States Code, Section 1001(a).

**A TRUE BILL:**



**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**

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**GRAND JURY FOREPERSON**